-18-

## **REMARKS**

In response to the Final Office Action mailed on October 28, 2008, Applicants respectfully request reconsideration. To expedite prosecution of this Application to allowance, Applicants submit the following reasons regarding patentability.

The final office action presents no particular reasons why claim 50 has been rejected. Accordingly, Applicants request allowance of claim or another final office action indicating why such a claim is not allowable.

Applicant encourages the Examiner to call the undersigned Attorney to discuss any issues of patentability to expedite prosecution of this application towards allowance.

## Rejection of Independent Claims

Claim 1 has been rejected under 35 U.S.C. §103(a) as being unpatentable over Grace et al., U.S. Patent Publication No. 2004/0075680 (hereinafter Grace) in view of Richardson (U.S. Patent 6,271,845).

Contrary to the assertion set forth in the office action, Applicants respectfully submit that claim 1 includes distinguishing limitations over the cited prior art. For example, claim 1 recites:

receiving selection of multiple entries in a hierarchy, the selection including multiple managed entities in a network;

displaying a management information view that includes management information associated with the multiple managed entities in the network;

displaying a drill down menu associated with the management information view, the drill down menu including selectable drill down options that correspond to respective drill down functions selectively

-19-

applied to the management information associated with the multiple managed entities;

identifying a selected drill down option chosen from the drill down menu;

producing a drill down view by applying the respective drill down function associated with the selected drill down option to the management information associated with the multiple managed entities, the produced drill down view including a presentation of the management information based on the applied respective drill down function;

displaying the drill down view on the graphical user interface; and continuing to display the drill down menu even after producing the drill down view for selection of another drill down option from the drill down menu and further drilling down with respect to the produced drill down view.

Applicants have reviewed the rejection for claim 1 and respectfully submit that amended claim 1 includes limitations not taught or suggested by the cited prior art.

For example, the office action concedes that Grace does not teach or suggest "continuing to display the drill down menu even after producing the drill down view for selection of another drill down option from the drill down menu and further drilling down with respect to the produced drill down view." The office action cites passages in Richardson as disclosing this claim limitation. More particularly, the office action cites Richardson at column 4 lines 62-66, which reads as follows:

It is therefore an object of the present invention to <u>quickly display</u> to the administrator of a managed network health problems associated with devices and services on the network and to provide the administrator with the capability to

-20-

<u>quickly respond</u> to and correct pending network problems before end users of the network are impacted. (emphasis added)

Applicants respectfully submit that the cited passages provides no indication whatsoever of displaying a menu of options. Perhaps more importantly, the cited passage also provides no indication whatsoever of continuing to display the drill down menu even after producing the drill down view for selection of another drill down option from the drill down menu and further drilling down with respect to the produced drill down view. Merely disclosing that it would be desirable to display something quickly, as in Richardson, does not solve any problem whatsoever. In other words, contrary to the assertion set forth in the office action, merely stating a problem does not provide a technical way of how to achieve this end. Accordingly, this statement in Richardson does not teach or suggest the claimed invention.

The office action concedes to this argument as the final office action attempts to cite a more substantive technical concept in Richardson to reject the claimed invention. For example, the office action also asserts that Richardson discloses the above claim limitation in FIG. 6, items 114, items 116, and column 7, lines 55-70, which reads as follows:

Referring to FIG. 6, an illustration of editing group view information, stored in a file, using a graphical user interface 110, according to the present invention, is shown. Selecting map properties from the menubar will result in the presentation of user interface 112 containing Configurable Applications selection list 114. Selecting NodeView from the Configurable Applications selection list 114 will result in the presentation of user interface 116 containing the group view attribute list 118. Group attributes are listed by name 120 and value 122. A group view attribute may be edited by selecting a group view attribute from the group view

-21-

attribute list 118 and modifying that group view attribute's value. (emphasis added)

Applicants respectfully submit that this cited passage also does not teach or suggest the above claim limitation. In fact, the cited passage merely indicates a way of merely selecting and editing group view attributes. For example, Richardson discloses selecting the word MAP in the main graphical user interface. In response to such a selection, the MAP PROPERTIES window pops up in the graphical user interface 110. In response to selection of the NodeView entry in MAP PROPERTIES window, the Configuration window pops up in the graphical user interface 110.

The Examiner argues that these technical concepts in Richardson are equivalent to displaying "more drill down menu options even after producing a first drilldown menu." Applicants respectfully disagree.

First, the statement set forth in the office action that the claimed invention is directed to merely displaying "more drill down menu options even after producing a first drilldown menu" fails to take into account the full scope of the claim limitation at issue. For example, Applicants do not merely claim displaying more drill down menu options after producing a first drilldown menu.

Instead, as recited by claim 1, the claimed invention is directed to initially displaying a drill down menu and, after receiving a drill down option and producing a drill down view, continuing to display the drill down menu so that a user or other entity can drill down yet further with respect to the produced drill down view using the same menu of drill down options. Thus, the office action fails to appreciate the true scope of the claim limitation.

-22-

Second, contrary to the assertion set forth in the office action and perhaps more importantly, the cited passages do not teach or suggest the claimed invention even though the office action mischaracterizes the above limitation. For example, as discussed above, the cited passage merely indicates a way of selecting and editing group view attributes. There is no indication whatsoever that a user can select from a menu of drill down options, display a drill down view, and then enable the user to select from the drill down options again to drill down further with respect to the produced drill down view.

More specifically, Richardson does enable drilling down, however, not in a manner as recited by the claimed invention. For example, Richardson discloses selecting the word MAP icon in the main graphical user interface. In response to such a selection, the MAP PROPERTIES window pops up in the graphical user interface 110. In response to selection of the NodeView entry in MAP PROPERTIES window, the Configuration window pops up in the graphical user interface 110.

At no time in this technical example in Richardson does he describe use of a common set of dill down options in a menu to display the MAP PROPERTIES window 112 and continued display of the common set of drill down options to enable opening of the configuration window 118. Instead, the user in Richardson selects an option in each newly displayed window to drill down and open another window. Thus, a same menu of drill down options is not used to open the MAP PROPERTIES window 112 and the configuration window 118. Display of the option to open the configuration window is dependent upon the MAP PROPERTIES window being opened.

Moreover, as is well known, when opening and viewing such windows as in Richardson, a user must typically close each window in the sequence of opened windows to get back to a main menu of options such as the main menu

-23-

of original options including map, edit, view, performance, etc. This technique is undesirable because the user has to close all of the windows behind him or her to use the menu options again.

Contrary to Richardson, the claimed invention recites "continuing to display the drill down menu even after producing the drill down view for selection of another drill down option from the drill down menu and further drilling down with respect to the produced drill down view." Thus, according to the claimed invention, the same menu of options enables a unique way of drilling down to view desirable information. Applicants respectfully submit that Richardson provides no technical equivalent and therefore does not teach or suggest the claimed invention. That is, in accordance with the discussion above, Richardson teaches away from the claimed invention as Richardson provides no indication whatsoever that the MAP icon used to open the MAP PROPERTIES window 112 can be used to drill down yet further with respect to any opened window. Instead, a window sequence with newly displayed selectable icons enables drilling down.

Accordingly, Applicants respectfully request allowance of claim 1. If the rejection of claim 1 is to be maintained, Applicants respectfully request that it be pointed out with particularity where the cited prior art discloses or suggests all of the claim limitations as disputed above. The final office action is deficient of providing any supporting technical analysis or details whatsoever that would teach or suggest the claimed invention. Accordingly, Applicants respectfully request allowance of claim 1.

Because claims 2-16 and 45-50 depend from and further limit claim 1 (and because claim 1 is in condition for allowance), Applicants submit that such claims are also in allowable condition.

-24-

Contrary to the assertion set forth in the final office action, Applicants respectfully submit that each of the dependent claims include further patentable distinctions over the cited prior art.

For example, claim 11 recites "displaying path information in relation to the management information view, the path information including: i) an entry corresponding to a present drill down level view of the displayed management information in the management view, and ii) at least one entry of a previous drill down level view of previously displayed management information."

With respect to claim 11, contrary to the assertion set forth in the final office action, neither Grace nor Richardson, individually or combined, teach or suggest this aspect of the claimed invention. For example, Richardson does not disclose path information including an entry at a current level. The cited passage in Richardson (at column 6, lines 4-7) only indicates that drill down would commence at a particular level. This is not providing path information. Also, Richardson does not teach or suggest displaying a previous drill down level in the path information as recited by the claimed invention. The cited passage in Richardson (at column 8, lines 17-20) only indicates what is required to drill down and provides no indication whatsoever of historical information of one or more previous drilldown levels. Thus, the cited passages are directed to a different technical matter than that of the claimed invention. Accordingly, Applicants respectfully submit that the cited prior art does not teach or suggest the claimed invention and that claim 11 is in condition for allowance over the cited prior art.

Claim 12 recites wherein the path information includes entries indicating a sequence of drill down options selected from the drill down menu to view the present drill down menu view; and wherein the at least one entry of the previous drill down level view may be selected by a user to change contents of the

-25-

management information view back to a corresponding previously displayed management information view.

With respect to claim 12, contrary to the assertion set forth in the final office action, neither Grace nor Richardson, individually or combined, teach or suggest this aspect of the claimed invention. For example, Richardson at column 10, lines 3-6 only indicates that original selection of an object enables drilling down to view information. This is not equivalent or suggestive that an entry in the path information can be used to revert back to a previously viewed drill down level. Grace at paragraph 56 also does not contemplate reverting back to a drill down level in a sequence. Accordingly, Applicants respectfully submit that the cited prior art does not teach or suggest the claimed invention and that claim 12 is in condition for allowance over the cited prior art.

Claim 15 recites "wherein the drill down menu includes at least two sets of selectable drill down options, a first set of selectable drill down options related to storage features of a storage area network, a second set of drill down options related to host features of the storage area network." Contrary to the assertion set forth in the final office action, neither Grace nor Richardson, individually or combined, teach or suggest this aspect of the claimed invention.

For example, with respect to claim 15, contrary to the assertion set forth in the office action, hosts 124, 126, and 152 in Grace are not selectable drill down options. It is not material that the STORAGE AREA NETWORK 100 in Grace paragraph 34 is simplified. Thus, Applicants submit that the office action uses the claimed invention as a blueprint to reject the claimed invention. Applicants request allowance of claim 15.

Claim 18 recites highlighting a first selectable drill down option and a second selectable drill down option in the drill down menu to indicate that the first

-26-

selectable drill down option and the second selectable drill down option can be selected by a viewer and applied to the management information in the second portion of the display screen; and in response to receiving selection of the first selectable drill down option from the drill down menu: i) updating the separately listed management information for each of the at least two managed entities selected from the hierarchy by providing a drill down view in accordance with the selection of the first selectable drill download; and ii) discontinuing highlighting of the first selectable drill down option from the drill down menu to indicate that the first selectable drill down option can no longer be selected to drill down with respect to a current drill down level view of the management information in the second portion of the display screen." The office action asserts that Wang discloses discontinuing highlighting a menu option to indicate that it can no longer be selected. Applicants respectfully submit that this passage in Wang merely indicates a way to input a domain name and select a device. There is no discussion whatsoever regarding discontinuing highlighting of a menu option, especially in the context of drilling down. Thus, Applicants respectfully submit that the final office action provides no reasonable basis for rejecting the claimed invention. Applicants request allowance of claim 15.

Claim 19 recites wherein the drill down menu includes at least two sets of selectable drill down options, a first set of selectable drill down options grouped and labeled to indicate that the first set of selectable drill down options can be used to drill down with respect to storage features of a storage area network, a second set of drill down options grouped and labeled to indicate that the second set of selectable drill down options can be used to drill down with respect to host features of the storage area network.

With respect to claim 19, the office action asserts that Richardson and Grace include two different sets of drilldown options. Applicants respectfully disagree. Grace at paragraphs 43-44 displays a user list, but not in the context

-27-

of the same type of menu as in the claimed invention. Further, contrary to the assertion set forth in the office action, Richardson at column 8, lines 1-9 only indicates that a user can drill down in a network – this passage provides no indication whatsoever of different sets of drill down options in a menu to view different features, especially not host features and storage features as in the claimed invention. Moreover, as mentioned above, the hosts 124, 126, and 156 in Grace are not drill down options. Instead, they are devices in a network. Thus, Applicants respectfully submit that the final office action provides no reasonable basis for rejecting the claimed invention. Applicants request allowance of claim 19.

Claim 20 recites "on a fourth portion of the display screen, displaying path information including: i) an entry corresponding to a drill down view of presently displayed management information, and ii) at least one entry corresponding to a previously displayed drill down view of management information." The office action cites Richardson at column 9, lines 22-26. This passage only indicates that a user can drill down in a network to identify network errors. There is no indication whatsoever that this passage has anything to do with displaying path information, especially none in which entries in the path information correspond to different drill down levels (e.g., a current drill down level and a previous drill down level) of a drill down process. Richardson at column 8, lines 17-20 provide no indication whatsoever of a current drill down level and previous drill down level. Instead, this passage merely indicates that an amount of drill down necessary depends on the location of an administrator in a hierarchy. Applicants respectfully submit that this has nothing to do with providing historical path information of a current drill down view and a previous drill down view. Thus, Applicants respectfully submit that the final office action provides no reasonable basis for rejecting the claimed invention. Applicants request allowance of claim 20.

-28-

Claim 43 recites "displaying the entry corresponding to the drill down view of presently displayed management information to include a label corresponding to a selectable drill down option selected by a viewer to view the current drill down level; and displaying the path information to include entries corresponding to previously viewed drill down levels of the management information." For the reasons as discussed above, Richardson does not teach or suggest that path information (e.g., history drill down information) includes entries corresponding to labels associated with any drill down options in a drill down menu. Such a configuration of the claimed invention enables a viewer to easily identify what drill down options were selected to arrive at a currently displayed drill down level. Item 102 in Richardson only enables a user to select a particular menu item to carry out a corresponding command – not provide a history of drill down information as in the claimed invention. Thus, Applicants respectfully submit that the final office action provides no reasonable basis for rejecting the claimed invention. Applicants request allowance of claim 43.

Claim 44 recites "on a fourth portion of the display screen, displaying path information including entries indicating a sequence of drill down options selected by a viewer, each of the entries being selectable by the viewer to revert back to a previous drill down level." The office action asserts that FIG. 10 in Grace as well as items 1008, 1002, and 1004 teach or suggest this claim limitation. Applicants respectfully disagree. Merely displaying a hierarchy does not indicate a sequence of previous previously selected drill down options. That is, contrary to the assertion set forth in the office action, the hierarchy in Grace includes no historical selection information. Thus, Applicants respectfully submit that the final office action provides no reasonable basis for rejecting the claimed invention. Applicants request allowance of claim 44.

-29-

Claim 45 recites "wherein displaying the drill down menu includes: highlighting a first group of the selectable drill down options to indicate that at least a first selectable drill down option and a second selectable drill down option in the first group can be selected to drill down with respect to the management information associated with the multiple managed entities; and de-highlighting a second group of the selectable drill down options to indicate that at least a third selectable drill down option and a fourth selectable drill down option in the second group cannot be selected to drill down with respect to the management information associated with the multiple managed entities." For the reasons as discussed above, neither Richardson nor Wang teach or suggest this claim limitation and the office action is unclear with its comparison. Thus, Applicants respectfully submit that the final office action provides no reasonable basis for rejecting the claimed invention. Applicants request allowance of claim 45.

Claim 46 recites: "wherein identifying the selected drill down option includes receiving selection of the first selectable drill down option in the first group, the method further comprising: in response to receiving the selection of the first selectable drill down option, i) initiating display of the management information in accordance with the first selectable drill down option, and ii) dehighlighting the first selectable drill down option to indicate that the first selectable drill down option cannot be selected." The office action asserts that Grace at paragraphs 43 and 44 and Wang at column 9 teach or suggest these claim limitations. Applicants respectfully disagree. Applicants respectfully submit that the passage in Wang merely indicates a way to input a domain name and select a device – not de-highlighting of an item, especially one in which the item is continually displayed during a drill down process. There is no discussion whatsoever regarding discontinuing highlighting of a menu option, especially in the context of drilling down. Paragraphs 43 and 44 only provide a way for a user to select which types of parameter information can be displayed. Thus, Applicants respectfully submit that the final office action provides no reasonable

-30-

basis for rejecting the claimed invention. Applicants request allowance of claim 46.

Claim 47 recites "displaying path information including a first entry corresponding to the selection of the first selectable drill down option in the drill down menu." For the reasons as discussed above, Richardson does not teach or suggest that path information (e.g., history drill down information) includes entries corresponding to labels associated with any drill down options in a drill down menu. Such a configuration enables a viewer to easily identify what drill down options were selected to arrive at a currently displayed drill down level. Contrary to the assertion set forth in the office action, item 102 in Richardson only enables a user to select a particular menu item to carry out a corresponding command – not provide a history of drill down information as in the claimed invention. Thus, Applicants respectfully submit that the final office action provides no reasonable basis for rejecting the claimed invention. Applicants request allowance of claim 47.

Claim 48 recites "receiving selection of the second selectable drill down option in the first group; in response to receiving the selection of the second selectable drill down option, i) initiating display of a further drill down view of the management information in accordance with the second selectable drill down option, and ii) de-highlighting the second selectable drill down option in the drill network menu." For reasons as discussed above, Applicants respectfully submit that the rejection of claim 48 is improper as well.

Claim 49 recites "displaying the path information to include a second entry, which follows the first entry in the path information, the second entry corresponding to the selection of the second selectable drill down option in the drill down menu." For reasons as discussed above, Applicants respectfully submit that the rejection of claim 49 is improper as well.

-31-

Claim 50 recites "enabling selection of the first entry in the path information; in response to receiving selection of the first entry in the path information, displaying the management information in accordance with the first selectable drill down option." The office action provides no analysis of how the cited prior art teaches or suggests each of the claim limitations in claim 50. Applicants respectfully submit that claim 50 patentable limitations. For example, display of the path enables a viewer to identify a sequence of previously applied drill down commands. Selection of the entries in the path information enables a user to revert back to a previous drill down view. None of the cited references teach or suggest such functionality.

For applicable reasons as discussed herein, Applicants respectfully submit that each of independent claims 17, 21, 37, 41, and 42 are also in condition for allowance. By virtue of dependency with respect to claim 17, dependent claims 18-20 and claims 43-44 also should be in condition for allowance. By virtue of dependency with respect to claim 21, dependent claims 22, and claims 31-36 also should be in condition for allowance. By virtue of dependency with respect to claim 37, dependent claims 38-40 also should be in condition for allowance.

-32-

## Conclusion

Applicant hereby petitions for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. <u>50-3735</u>.

If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned Attorney for Applicants at (508) 616-9660 in Westborough, Massachusetts.

Respectfully submitted, /PPK/

Paul P. Kriz, Esq.
Attorney for Applicant(s)
Registration No.: 45,752
Chapin Intellectual Property Law, LLC
Westborough Office Park
1700 West Park Drive
Westborough, Massachusetts 01581
Telephone: (508) 616-9660

Facsimile: (508) 616-9661

Attorney Docket No.: EMC03-20(02068)

Dated: January 13, 2009